IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LEINANI DESLANDES, on behalf of herself and all others similarly situated,

Plaintiff,

v.

McDONALD'S USA, LLC, et al.

Defendants.

Civil Case No. 17-cv-04857

Judge Jorge L. Alonso Magistrate Judge M. David Weisman

STEPHANIE TURNER, on behalf of herself and all others similarly situated,

Plaintiff,

v.

McDONALD'S USA, LLC, et al.

Defendants.

Civil No. 19-cv-05524

PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGMENT ON MCDONALD'S ASSERTED JUSTIFICATIONS

Pursuant to Fed. R. Civ. P. 56 and L.R. 56.1(a), Plaintiffs Leinani Deslandes and Stephanie Turner, by their undersigned counsel, submit this Cross-Motion for Summary Judgment on McDonald's Asserted Justifications. In support of this motion, Plaintiffs have filed contemporaneously a Combined Memorandum of Law in Opposition to McDonald's Motion for Summary Judgment and in Support of Cross-Motion for Summary Judgment on McDonald's Asserted Justifications, a Statement of Material Facts Pursuant to Local Civil Rule 56.1 and Exhibits Thereto, and a Response to McDonald's Statement of Undisputed Material Facts and Exhibits Thereto.

WHEREFORE, Plaintiffs respectfully request that the Court enter judgment in favor of Plaintiffs on McDonald's asserted justifications.

Dated: November 16, 2021 Respectfully submitted,

/s/ Dean M. Harvey

Dean M. Harvey* Anne B. Shaver* Lin Y. Chan* Yaman Salahi*

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

275 Battery Street, 29th Floor San Francisco, California 94111-3339 Tel: (415) 956-1000 dharvey@lchb.com ashaver@lchb.com lchan@lchb.com ysalahi@lchb.com

Jessica A. Moldovan*

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

250 Hudson Street, 8th Floor New York, NY 10013 Tel: (212) 355-9500 jmoldovan@lchb.com

Derek Y. Brandt (#6228895) Leigh M. Perica (#6316856)

Connor P. Lemire*

MCCUNE WRIGHT AREVALO, LLP

Edwardsville, Illinois 62025
Tel: (618) 307-6116
Fax: (618) 307-6161
dyb@mccunewright.com
lmp@mccunewright.com
cpl@mccunewright.com

231 North Main Street, Suite 20

Richard D. McCune*
Michele M. Vercoski*
MCCUNE WRIGHT AREVALO, LLP
3281 East Guasti Road, Suite 100

Ontario, California 91761 Tel: (909) 557-1250 rdm@mccunewright.com mmv@mccunewright.com

Counsel for Individual and Representative Plaintiffs Leinani Deslandes and Stephanie Turner

* Admitted pro hac vice

CERTIFICATE OF SERVICE

I, Dean M. Harvey, an attorney, hereby certify that the foregoing document was electronically filed on November 16, 2021 and will be served electronically via the Court's ECF Notice system upon the registered parties of record.

/s/ Dean M. Harvey
Dean M. Harvey